

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
MIDDLE DIVISION**

**AUNDRA DEBREL BOYKINS,** )  
 )  
 **Plaintiff,** )  
 )  
 **v.** ) **Case No. 4:19-CV-1934-ACA**  
 )  
 **JEFFERSON DUNN, *et al.*,** )  
 )  
 **Defendants.** )

**THE ADOC PARTIES' EVIDENTIARY SUBMISSION IN SUPPORT OF**  
**MOTIONS FOR SUMMARY JUDGMENT**

Defendants Commissioner John Hamm (“Commissioner Hamm”), Warden Guy Noe (“Warden Noe”), Dewayne Estes (“Estes” and, together with Commissioner Hamm and Warden Noe, the “Correctional Officials”) and Defendant Marc Walker (“Walker” and, together with the Correctional Officials, the “ADOC Parties”) submit the attached evidentiary materials in support of their Motions for Summary Judgment:

**Exhibit A** Declaration of Ellie B. Putman, dated February 17, 2023;

**Exhibit B** Declaration of John Q. Hamm, dated February 10, 2023;

**Exhibit C** Declaration of Arnaldo Mercado, dated February 14, 2023;

**Exhibit D** Declaration of Cortez Whittington, dated August 10, 2022;

**Exhibit E** Alabama Department of Corrections (“ADOC”) Legal Division’s Certification of Records, dated February 15, 2023, with the following exhibits attached thereto:

**Exhibit 1** ADOC Strategic Plan 2019-2022

- Exhibit 2** Alabama Prison Transformation Initiative
- Exhibit 3** Administrative Regulation No. #331 - Security Inspections
- Exhibit 4** Plaintiff's Institutional File
- Exhibit 5** Plaintiff's Movement History
- Exhibit 6** Cortez Whittington's Institutional File
- Exhibit 7** Alabama Uniform Incident/Offense Report
- Exhibit F** Alabama Department of Corrections Certification of Health Records, dated February 6, 2023, with the following exhibits attached thereto:
  - Exhibit 1** Emergency Department Referral
  - Exhibit 2** Inmate Body Chart Documentation Form
- Exhibit G** Alabama Department of Corrections Certification of Health Records, dated February 13, 2023, with the following exhibit attached thereto:
  - Exhibit 1** Inmate Body Chart Documentation Form
- Exhibit H** UAB Health System Custodial Certificate, dated July 20, 2022, with the following exhibit attached thereto:
  - Exhibit 1** Patient Discharge Summary
- Exhibit I** St. Clair Correctional Facility's Certification of Records, dated February 10, 2023, with the following exhibits attached thereto:
  - Exhibit 1** December 2, 2017 Duty Post Log
  - Exhibit 2** Standard Operating Procedure No. #031 - Staffing
- Exhibit J** Excerpts from the Deposition of Aundra Debel Boykins, dated August 12, 2022, with the following exhibits attached thereto:
  - Exhibit 1** Alabama Department of Corrections Prosecution Waiver (Ex. 4)

**Exhibit 2** Alabama Department of Corrections Disciplinary Report (Ex. 6)

**Exhibit 3** Alabama Department of Corrections Disciplinary Report (Ex. 8)

**Exhibit K** Excerpts from the Deposition of Jefferson Dunn, dated October 10, 2022;

**Exhibit L** Excerpts from the Deposition of Dewayne Estes, dated August 4, 2022;

**Exhibit M** Excerpts from the Deposition of Mark Inch, dated January 17, 2023, with the following exhibit attached thereto:

**Exhibit 1** Expert Report of Mark S. Inch (Ex. 1)

**Exhibit N** Excerpts from the Deposition of Guy Noe, dated August 2, 2022;

**Exhibit O** Excerpts from the Deposition of Joseph P. Rion, dated January 13, 2023, with the following exhibit attached thereto:

**Exhibit 1** Expert Report of Joseph P. Rion (Ex. 8)

**Exhibit P** Excerpts from the Deposition of Marc Walker, dated August 9, 2022, with the following exhibits attached thereto:

**Exhibit 1** Shift Roster (Ex. 4)

**Exhibit 2** Duty Officer Report, Incident Report, and Enemy Validation (Ex. 5)

**Exhibit Q** Excerpts from the Deposition of Cortez Whittington, dated October 4, 2022;

**Exhibit R** Excerpts from the Deposition of Brian Zawilinski, dated January 18, 2023, with the following exhibit attached thereto:

**Exhibit 1** Expert Report of Brian Zawilinski (Ex. 3)

**Exhibit S** Plaintiff's Responses and Objections to Defendants' Requests for Admission.

Dated: February 17, 2023

Respectfully submitted,

*/s/ William R. Lunsford*

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*One of the Attorneys for the Correctional  
Officials*

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served upon all attorneys of record in this matter by e-mail and/or by U.S. Mail on this 17th day of February, 2023.

*/s/ William R. Lunsford*  
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*Of Counsel*